

KELLER BENVENUTTI KIM LLP
Jane Kim (#298192)
(jkim@kbbkllp.com)
David A. Taylor (#247433)
(dtaylor@kbbkllp.com)
Thomas B. Rupp (#278041)
(trupp@kbbkllp.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: 415 496 6723
Fax: 650 636 9251

ROVENS LAMB LLP
STEVEN A. LAMB (SBN 132534)
slamb@rovenslamb.com
Telephone: (310) 536.7830
Facsimile: (310) 872.5489
2601 Airport Drive, Suite 370
Torrance, California 90505

LAW OFFICES OF JENNIFER L. DODGE INC.
Jennifer L. Dodge (#195321)
(jdodgelaw@jenniferdodgelaw.com)
2512 Artesia Blvd., Suite 300D
Redondo Beach, California 90278
Tel: (310) 372.3344
Fax: (310) 861.8044

Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** ALL PAPERS SHALL BE FILED IN THE
LEAD CASE, NO. 19-30088 (DM)*

Case Nos. 19-30088 (DM)

(Lead Case) (Jointly Administered)

**DECLARATION OF ROB SULLIVAN IN
SUPPORT OF PG&E'S MEMORANDUM
OF POINTS AND AUTHORITIES IN
OPPOSITION TO MOTION FOR PARTIAL
SUMMARY JUDGMENT AND COUNTER-
MOTION FOR SUMMARY JUDGMENT**

Date: April 11, 2023

Time: 10:00 a.m. (Pacific Time)

Place: (Tele/Videoconference Only)

United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 I, Rob Sullivan, declare:

2 1. I am Principal Land Surveyor for Pacific Gas and Electric Company.

3 2. I am and for over 14 years have been a licensed surveyor holding License No.
4 8558 in the State of California. I have the qualifications and experience to review easements,
5 rights of way and other property rights and to plot those on drawings depicting the locations and
6 boundaries of such easements, rights of way, and other property rights.

7 3. Attached hereto are true and correct copies of the following exhibits kept and
8 maintained in the ordinary course of business by Pacific Gas and Electric Company:

- 9 a. Exh A – Easement [LD 2303-05-1151], recorded on September 12, 1923 as
10 depicted in Volume 87 of Deeds page 328 in the San Mateo [Recording Office].
11 b. Exh B –Easement [LD 2304-05-0096], recorded on March 3, 1923 as depicted in
12 Volume 68 of Deeds page 208 in the San Mateo [Recording Office].
13 c. Exh C – Easement [LD 2303-05-0076], recorded on May 21, 1910 as depicted in
14 Volume 177 of Deeds page 393 in the San Mateo [Recording Office].
15 d. Exh D – Easement [LD 2303-05-1152], recorded on March 3, 1923 as depicted
16 in Volume 64 of Deeds page 406 in the San Mateo [Recording Office].

17 4. Attached hereto as Exh E is a true and correct copy of a drawing created by me of APN:
18 020-1550-030, commonly known as the Komir Property and which is the subject of the
19 complaint in this action, which accurately depicts the recorded easements in Exhs A-D
20 attached hereto.

21
22 Executed at Concord, California on the 28 of February 2023.

23 I declare under penalty of perjury under the laws of the State of California that the
24 foregoing is true and correct.

25
26 
27 Rob Sullivan